

1 SCOTT SAGARIA (State Bar No. 217981)  
ELLIOT GALE (State Bar No. 263326)  
2 JOE ANGELO (State Bar No. 268542)  
SAGARIA LAW, P.C.  
3 2033 Gateway Place, 5th Floor  
San Jose, California 95110  
4 Telephone: (408) 279-2288  
Facsimile: (408) 279-2299

5 Attorneys for Plaintiff  
6 MELISSA CONKLIN

7 MARK D. LONERGAN (State Bar No. 143622)  
mdl@severson.com  
8 REBECCA S. SAELAO (State Bar No. 222731)  
rss@severson.com  
9 ALISA A. GIVENTAL (State Bar No. 273551)  
aag@severson.com  
10 SEVERSON & WERSON  
A Professional Corporation  
11 One Embarcadero Center, Suite 2600  
San Francisco, California 94111  
12 Telephone: (415) 398-3344  
Facsimile: (415) 956-0439

13 Attorneys for Defendant  
14 WELLS FARGO BANK, N.A. (sued as "Wells  
Fargo, National Association")  
15

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18

19 MELISSA CONKLIN,

20 Plaintiff,

21 vs.

22 EXPERIAN INFORMATION SOLUTIONS,  
INC., EQUIFAX, INC.; AMERICAN  
23 EXPRESS COMPANY; WELLS FARGO,  
NATIONAL ASSOCIATION AND DOES 1  
24 THROUGH 100 INCLUSIVE,

25 Defendant.  
26  
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Case No. 4:15-cv-04315-YGR

**STIPULATION AND [PROPOSED]  
ORDER TO DISMISS WELLS FARGO**

Pursuant to the terms of the parties' contract, Plaintiff MELISSA CONKLIN ("Plaintiff"), and Defendant WELLS FARGO BANK, N.A., sued as "Wells Fargo, National Association," ("Wells Fargo" or "Defendant," collectively Wells Fargo and Plaintiff are referred to as the "Parties"), hereby stipulate and agree as follows:

1. The Parties may submit this matter to binding non-judicial arbitration;
2. Any arbitration shall be conducted through AAA; and
3. That Wells Fargo be dismissed from this action with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(2), and that each party shall bear its own attorneys' fees and costs as to this federal court action.

IT IS SO STIPULATED.

DATED: December 29, 2015

SAGARIA LAW  
A Professional Corporation

By: /s/ Elliot W. Gale  
Elliot W. Gale

Attorneys for Plaintiff MELISSA CONKLIN

DATED: December 29, 2015

SEVERSON & WERSON  
A Professional Corporation

By: /s/ Rebecca S. Saelao  
Rebecca S. Saelao

Attorneys for Defendant WELLS FARGO, NATIONAL ASSOCIATION

I, Rebecca S. Saelao, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Elliot Gale has concurred in this filing.

/s/ Rebecca S. Saelao

1 Pursuant Rule 41(a)(2) of the Federal Rules of Civil Procedure, and based on the  
2 stipulation submitted by Plaintiff and Wells Fargo, this action is hereby DISMISSED WITH  
3 PREJUDICE in favor of arbitration as to Defendant Wells Fargo Bank, N.A., sued as Wells Fargo,  
4 National Association, and each party shall bear its own costs and fees.

5 **IT IS SO ORDERED.**

6  
7 DATED: \_\_\_\_\_

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9  
10 \_\_\_\_\_  
Hon. Yvonne Gonzalez Rogers  
UNITED STATES DISTRICT JUDGE